

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Marvin Fleming, et al. v. National Football  
League, et al. (Plaintiffs Albert Dixon and  
Charlene Frost-Dixon ONLY)

Court File No. 2:13-cv-51-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFFS ALBERT DIXON  
AND CHARLENE FROST-DIXON**

Charles S. Zimmerman, J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Albert Dixon and Charlene Frost-Dixon only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Marvin Fleming, et al. v. National Football League, et al.*, No. 2:13-cv-51-AB, in the Eastern District of Pennsylvania on January 4, 2013, for the benefit of several retired National Football League players, including Albert Dixon and Charlene Frost-Dixon.

2. Plaintiffs' counsel filed a short form complaint for Albert Dixon and Charlene Frost-Dixon on January 10, 2013.

3. Since then, irreconcilable differences have arisen between Plaintiffs Albert Dixon, Charlene Frost-Dixon, and the undersigned.

4. Plaintiffs' counsel properly notified Albert Dixon and Charlene Frost-Dixon of counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Albert Dixon and Charlene Frost-Dixon only in Court File No. 2:13-cv-51-AB.

Dated: February 25, 2019

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

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